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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v

SKYRYSE, INC., ROBERT ALIN
 PILKINGTON, MISOOK KIM, and
 DOES NOS. 1-50,

Defendants.

SKYRYSE, INC.,

Counterclaimant,

v

MOOG INC.,

Counterdefendant.

CASE NO. 2:22-cv-09094-GW-
 MAR

**JOINT STIPULATION
 REGARDING DEADLINE TO
 AGREE TO SEARCH TERMS**

Complaint filed: March 7, 2022
 Counterclaims filed: January 30,
 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and
2 Counterdefendant Moog Inc. (“Moog”) and Defendant and Counterclaimant
3 Skyrise, Inc. (“Skyrise”) (Moog and Skyrise are collectively referred to as the
4 “Parties”) through their respective attorneys of record, as follows:

5 WHEREAS, on June 30, 2023, the Court issued its final ruling (Dkt. 564) (the
6 “Final Ruling”) granting in part and denying in part Moog’s Motion to Enforce
7 Compliance with the March 11, 2022 Stipulated TRO and for Monetary and Adverse
8 Inference Sanctions for Contempt and Spoliation (Dkt. 400);

9 WHEREAS, in the Final Ruling, the Court ordered the Parties to agree to a
10 finalized set of search terms to be run across Skyrise’s Polarion Repository, Git
11 Repository, and Google Drive Account folders by July 31, 2023 (Dkt. 564 at 10);

12 WHEREAS, on July 31, 2023, the Court granted a joint stipulation by the
13 Parties agreeing that their deadline to agree to a finalized set of search terms and
14 searching protocols would be extended by one week, from July 31, 2023 to August
15 7, 2023 (Dkt. 589);

16 WHEREAS, the Parties require additional time to continue to meet and confer
17 regarding appropriate search terms and searching protocols, and have agreed to a
18 continuance of the August 7, 2023 deadline to August 11, 2023, subject to the
19 Court’s approval;

20 WHEREAS, if the Parties are not able to reach complete agreement on all
21 search terms and searching protocols by the continued deadline, the Parties intend
22 to submit a joint report on August 11, 2023 setting forth their respective positions
23 on any outstanding issues;

24 NOW THEREFORE, subject to the Court’s approval, the Parties stipulate and
25 agree that the Parties’ deadline to agree to a finalized set of search terms and
26 searching protocols will be extended from August 7, 2023 to August 11, 2023.

27 **IT IS SO STIPULATED.**
28

1
2 Dated: August 4, 2023
3

**SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP**

4 By: /s/ Kazim A. Naqvi
5 Kazim A. Naqvi
6 Counsel for Plaintiff and Counter-
7 Defendant Moog Inc.

LATHAM & WATKINS LLP

8 By: /s/ Joseph H. Lee
9 Joseph H. Lee
10 Counsel for Defendant and
11 Counterclaimant Skyrise, Inc.

12 **ATTESTATION**

13 Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Joseph Lee, attest that
14 concurrence in the filing of this document has been obtained by all signatories.

15 Dated: August 4, 2023

/s/ Joseph H. Lee